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A LAW CORPORATION

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August 14, 2020

Honorable Wes Reber Porter
United States Magistrate Judge
District of Hawaii
300 Ala Moana Boulevard
Honolulu, Hawaii 96850

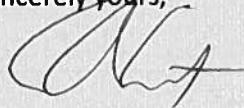
Re: Puana vs. Kealoha
Civil No. 16-00659 JMS-WRP

Dear Judge Porter:

Following the status conference today, and in view of the Court's inclination to maintain a stay in the above referenced matter – we do nonetheless request permission to file an amended complaint so that all parties will have the benefit of our updated versions of the facts and the plaintiffs' claims to include claims in behalf of Florence Puana. I do not believe that we need a formal motion for leave to amend the complaint at this juncture since to my knowledge no party has yet answered the initial complaint or filed any dispositive motions.

We believe that having an amended complaint now, rather than at some later time, will enable the litigation to move forward more efficiently when the current stay is lifted. Most importantly, our amended complaint may raise potential conflicts of interest and necessitate that certain parties obtain new or additional counsel, and we are hoping that process will occur now – rather than later – to avoid further delays. In any event, the filing of an amended complaint at this juncture to which no immediate responsive pleadings will be required will not cause inconvenience or prejudice to anyone.

Sincerely yours,



Eric A. Seitz
Jonathan M.F. Loo

cc Traci Rei G. Morita, Esq.
Deputy Corporation Counsel